

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION

and

STATE OF ILLINOIS

Plaintiffs,

v.

ADVOCATE HEALTH CARE NETWORK,

ADVOCATE HEALTH AND HOSPITALS
CORPORATION,

and

NORTHSHORE UNIVERSITY
HEALTHSYSTEM

Defendants.

1:15-cv-11473

Judge Jorge L. Alonso
Magistrate Judge Jeffrey Cole


FILED

DEC 21 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**PLAINTIFF FEDERAL TRADE COMMISSION'S UNOPPOSED MOTION
TO FILE COMPLAINT UNDER SEAL**

Plaintiff, the Federal Trade Commission (the "Commission"), respectfully moves the Court for an order, pursuant to Rules 5 and 7(b) of the Federal Rules of Civil Procedure and Rules 5.7 and 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, directing the Clerk of the Court to file under seal, until further order, the following document in this action:

- Complaint for Temporary Restraining Order and Preliminary Injunction Pursuant to Section 13(b) of the Federal Trade Commission Act.



Due to special circumstances, explained and supported by the memorandum in support of the Commission's motion attached hereto, it is necessary to restrict access to the above document during the initial filing of the Commission's moving papers.

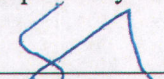
The Commission is aware that absent an order extending or setting aside the sealing, the document and its contents will become public on the seventh day following the date of filing.

Counsel for the Commission has conferred with counsel for all Defendants on this motion. Counsel for Defendants have indicated they will not oppose this motion.

A proposed order is attached.

Dated: December 21, 2015

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of December, 2015, I served the foregoing on the following counsel via electronic mail:

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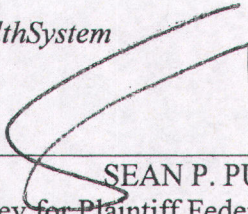
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Defendants.

No. ____-cv-____

**[PROPOSED] ORDER DIRECTING THE FILING UNDER SEAL
OF THE COMPLAINT**

Upon consideration of Plaintiff Federal Trade Commission's unopposed motion for an order, pursuant to Rules 5 and 7(b) of the Federal Rules of Civil Procedure and Rules 5.7 and 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, to file certain documents under seal,

IT IS HEREBY ORDERED that the Complaint for Temporary Restraining Order and Preliminary Injunction Pursuant to Section 13(b) of the Federal Trade Commission Act ("Complaint") be filed under seal until further order of the Court; and

IT IS FURTHER ORDERED that Plaintiff Federal Trade Commission may move to unseal the Complaint after Defendants and third parties have had full opportunity to review it; and

IT IS FURTHER ORDERED that counsel for Plaintiffs Federal Trade Commission and State of Illinois and counsel for all Defendants shall have access to the Complaint without further order of the Court, and the Court may destroy the document following the conclusion of the case.

SO ORDERED, this ____ day of _____, 2015.

United States District Court Judge

NAMES OF PERSONS TO BE SERVED

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